

EXHIBIT

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AFFIDAVIT OF BEN McCLURKIN

STATE OF ALABAMA)
) SS:
COUNTY OF _____)

I, Ben McClurkin, under penalty of perjury, and duly competent to testify on the matters herein, state as follows:

1. I am currently, and was during the relevant time of this lawsuit, employed as a pharmaceutical sales representative for Pfizer Inc..

2. I have never detailed the prescription pharmaceuticals Celebrex™ or Bextra™ to any physician in my capacity as a pharmaceutical sales representative for Pfizer Inc.

BEN McCLURKIN

Before me, the undersigned Notary Public, came Ben McClurkin, who is known to me, and who first being duly sworn, deposed and stated that the averments of this affidavit are true and correct, and who executed this affidavit in my person and present with his hand and seal, on this the _____ day of September, 2005.

NOTARY PUBLIC

My commission expires: _____